

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

'09 DEC 22 P3:10

UNITED STATES OF AMERICA,

Plaintiff,

v.

HELEN M. LOOSE,

Defendant.

Case No. 09-CR-09 CR-316  
[18 U.S.C. §§ 1341 and 513(a) & 2]

INDICTMENT

THE GRAND JURY CHARGES:

Allegations Common to all Counts

1. Beginning in or about August 2008 and continuing to January 23, 2009, in the State and Eastern District of Wisconsin and elsewhere,

**HELEN M. LOOSE**

and others known and unknown to the grand jury devised and carried out a scheme to defraud and to obtain money by means of material false and fraudulent pretenses and representations (hereinafter the "scheme"), which scheme is more fully described below.

2. Through her scheme, Loose sought to defraud private individuals as well as various banks including the Horicon Bank, Canadian Bank of Commerce, Pluswood Credit Union, and State Employees Credit Union.

3. For purposes of executing her scheme, Loose used and caused the use of the United States Postal Service and private or commercial interstate carriers including the United Parcel Service (UPS) and Federal Express (Fed Ex) as described below.

**The Scheme to Defraud**

4. Loose's scheme to defraud and to obtain money by means of material false and fraudulent pretenses and representations was essentially as follows:

(a) During the time frame relevant to this Indictment, Loose and other conspirators would approach an unsuspecting person in the United States via the internet and solicit contact information for them through employment advertisements. The individual was then sent via the U.S. Mail, UPS, or Fed Ex, a counterfeit check or money order and given instructions to cash the counterfeit document as part of their employment. Once cashed, the individual was told to send the cash obtained to a particular location and keep a portion of the proceeds.

(b) For purposes of executing the scheme to defraud, beginning in August 2008 and continuing to January 20, 2009, Loose received at various locations in the Eastern District of Wisconsin numerous packages through the U.S. mail containing counterfeit checks and money orders (hereinafter "securities"). Included with the counterfeit securities in some of the packages were pre-addressed envelopes bearing the names and addresses of individuals in the United States (hereinafter "recipients").

(c) It was further part of the scheme to defraud that Loose added the recipient's name to the securities prior to it being sent. Loose also included a letter with the security instructing the recipient who to contact after the security was cashed. If not pre-addressed, Loose addressed the

mailings with printed or hand written labels and then sent them to the recipients by U.S. Mail, Fed Ex or UPS.

(d) It was further part of the scheme to defraud that in December 2008, Loose obtained a money order from Pluswood Credit Union and a cashiers check from Horicon Bank. Loose sent these securities to conspirators in order for them to duplicate and counterfeit the securities to further the scheme.

(e) As a result of her scheme to defraud, Loose received approximately \$3,000.00 in U.S. Currency.

**Executing the Scheme to Defraud**

**COUNTS ONE AND TWO**

**THE GRAND JURY FURTHER CHARGES:**

On or about the dates listed below, in the Eastern District of Wisconsin, the defendant knowingly and intentionally executed the scheme to defraud in the manner described below.

<u>Count</u>	<u>Date</u>	<u>Execution of Scheme to Defraud</u>
1	1/2/09	Loose issued Money Orders, numbers 13512 and 10974, purported to be drawn on Pluswood Credit Union in the amounts of \$890.00 and \$900.00 to L.F. which she caused to be delivered by United Parcel Service.
2	01/15/09	Loose issued a Cashiers Check, number 019823, purported to be drawn on the State Employee's Credit Union in the amount of \$1,500.00 to K.S. which she caused to be delivered by United Parcel Service.

Each in violation of Title 18, United States Code, Sections 1341 and 2.

**COUNT THREE****THE GRAND JURY FURTHER CHARGES:**

On or about November 10, 2008, in the State and Eastern District of Wisconsin and elsewhere,

**HELEN M. LOOSE**

possessed the following counterfeit securities, to wit: checks purported to be of Canadian Imperial Bank of Commerce, an organization which operated in, and by its activities affected interstate and foreign commerce, with the intent to deceive another person and organization:

<u>Payable to</u>	<u>Remitter</u>	<u>Number</u>	<u>Amount</u>
H.H.	Susan Montgomery	842 8901	\$2,000.00
D.W.	Susan Montgomery	842 8901	\$2,000.00
S.R.	Susan Montgomery	842 8901	\$2,000.00
J.B.	Susan Montgomery	842 8901	\$2,000.00
B.A.	Susan Montgomery	842 8901	\$2,000.00
T.R.	Susan Montgomery	842 8901	\$2,000.00
A.G.	Susan Montgomery	842 8901	\$2,000.00
K.E.	Susan Montgomery	842 8902	\$2,500.00

All in violation of Title 18, United States Code, Sections 513(a) and 2.

**COUNT FOUR****THE GRAND JURY FURTHER CHARGES:**

On or about January 7, 2009, in the State and Eastern District of Wisconsin and elsewhere,

**HELEN M. LOOSE**

possessed the following counterfeit securities, to wit: checks purported to be of Safeway, an organization which operated in, and by its activities affected interstate and foreign commerce, with the intent to deceive another person and organization:

<u>Payable to</u>	<u>Remitter</u>	<u>Number</u>	<u>Amount</u>
D.M.	Denise Otis	5931768571	\$875.00
D.M.	Denise Otis	5931768423	\$875.00
H.J.	Denise Otis	5931768528	\$875.00
H.J.	Denise Otis	5931768448	\$875.00
G.G.	Denise Otis	5931768530	\$875.00
<b>G.G.</b>	Denise Otis	5931768428	\$875.00
N.B.	Denise Otis	5931768764	\$875.00
N.B.	Denise Otis	5931768604	\$875.00

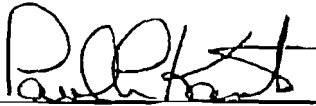
All in violation of Title 18, United States Code, Sections 513(a) and 2.

A TRUE BILL:



FOREPERSON

Dated: 12/22/09



MICHELLE L. JACOBS  
United States Attorney